## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA	*	CR. NO. 99cr206(JAF)
	*	
Plaintiff	*	
	*	
V	*	
	*	
ROBINSON QUINONES HERNANDEZ	*	
	*	
Defendant	*	

## URGENT MOTION REQUESTING LEAVE TO FILE NOTICE OF APPEARANCE

## TO THE HONORABLE COURT

**COMES NOW** the undersigned attorney who very respectfully states and prays as follows:

Defendant's common law wife met with the undersigned attorney and requested that she appear as his counsel in the Final Revocation Hearing. Thereafter the undersigned attorney sent an e-mail to Attorney Francisco Acevedo Padilla to inform him about defendant's request. No response was ever received from Attorney Padilla despite receipt of the e-mail. In addition defendant's wife personally requested that he withdraw as counsel of record. Yesterday, defendant's common law wife retained the services of the undersigned attorney, and today she informed the undersigned that defendant's Final Revocation Hearing is scheduled for October 16, 2006 at 1:00 p.m.

As a matter of courtesy to Attorney Padilla, the undersigned attorney has never had any contact with defendant Robinson Quinones Hernandez, as such the undersigned will not be ready for the Final Revocation Hearing which at a first glance appears to have merit. In view of the above,

it is respectfully requested that this Honorable Court allow the undersigned attorney to appear on behalf of defendant Robinson Quinones Hernandez and that it reschedule defendant's Final Revocation Hearing.

**WHEREFORE**, it is respectfully requested that this Honorable Court allow the undersigned attorney to appear on behalf of defendant Robinson Quinones Hernandez and that it reschedule defendant's Final Revocation Hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on this 15th day of October, 2006.

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## **CERTIFICATE OF SERVICE**

I hereby certify that an exact copy of this Motion has filed via the ECF/CCM filing system which will notify all counsel of record.

S/Anita Hill Adames, Esq.